

WEIL, GOTSHAL & MANGES LLP

Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Ray C. Schrock, P.C. (*pro hac vice*)
(ray.schrock@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER & BENVENUTTI LLP

Tobias S. Keller (#151445)
(tkeller@kellerbenvenutti.com)
Jane Kim (#298192)
(jkim@kellerbenvenutti.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 496-6723
Fax: (415) 636-9251

Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**STIPULATION BETWEEN DEBTORS
AND TURNER CONSTRUCTION
COMPANY EXTENDING TIME TO
RESPOND TO BAR DATE MOTION**
Re: Dkt. No. 1784

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and Turner Construction
4 Company (“**Turner**”), on the other hand. The Debtors and Turner are referred to in this
5 Stipulation and Agreement for Order collectively as the “**Parties**,” and each as a “**Party**.” The
6 Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On May 1, 2019, the Debtors filed the *Motion of Debtors Pursuant to 11 U.S.C.*
9 *§§ 502(b)(9) and 105(a), Fed. R. Bankr. P. 2002, 3003(c)(3), 5005, and 9007, and L.B.R. 3003-1*
10 *for Order (I) Establishing Deadline for Filing Proofs of Claim, (II) Establishing the Form and*
11 *Manner of Notice Thereof, and (III) Approving Procedures for Providing Notice of Bar Date and*
12 *Other Information to All Creditors and Potential Creditors* [Dkt. No. 1784] (the “**Bar Date**
13 **Motion**”), which is set for a hearing before the Court at 9:30 a.m. on June 11, 2019. Any
14 response or opposition to the Bar Date Motion is due by 4:00 p.m. (Pacific Time) on May 28,
15 2019.

16 B. Counsel for Turner has requested, and counsel for the Debtors has agreed, that the
17 time for Turner to respond to the Bar Date Motion be extended.

18 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
19 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
20 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
21 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
22 **THAT:**

23 1. The time for Turner to file and serve any response or opposition to the Bar Date
24 Motion is extended through 4:00 p.m. (Pacific Time) on May 31, 2019.

25 [Signatures on next page]
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Dated: May 28, 2019

KELLER & BENVENUTTI LLP

/s/ Jane Kim

Jane Kim

*Attorneys for Debtors
and Debtors in Possession*

Dated: May 28, 2019

SEYFARTH SHAW LLP

/s/ M. Ryan Pinkston

M. Ryan Pinkston

*Attorneys for Turner Construction
Company*